

Leo M. LaRocca (SBN 115014)
NIVEN & SMITH, LLP
275 Battery Street, Suite 1120
San Francisco, CA 94111-3383
Telephone: 415-981-5451
Facsimile: 415-433-5439
Email: leo@nivensmith.com

Attorneys for Defendant ELIZABETH ANN BRABY

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

ANDRES GOMEZ,

Case 22-cv-00036-PJH

Plaintiff

vs.

ELIZABETH ANN BRABY.

**STIPULATION TO EXTEND TIME FOR
DEFENDANT ELIZABETH ANN BRABY
TO RESPOND TO PLAINTIFF'S
COMPLAINT**

Defendant.

IT IS HEREBY STIPULATED by and between the parties hereto, through their respective attorneys, that Defendant ELIZABETH ANN BRABY may have additional time within which to answer or otherwise respond to Plaintiff's Complaint. Therefore, the last day for Defendant ELIZABETH ANN BRABY to answer or otherwise respond to Plaintiff's Complaint is March 25, 2022. Defendant ELIZABETH ANN BRABY has recently retained counsel. This additional time is necessary for Defendant ELIZABETH ANN BRABY's counsel to both investigate the claim as set forth in the Complaint and explore possible early resolution of this claim.

IT IS FURTHER STIPULATED by and between the parties hereto, through their respective attorneys, that the parties shall have additional time within which the parties and

1 counsel to hold a joint inspection of the premises pursuant to General Order No. 56, §7.
2 The current last day to undertake this joint site inspection is May 9, 2022. Pursuant to this
3 Stipulation, the parties shall now have up to and including June 13, 2022, to hold the joint
4 site inspection of the premises.
5

6 GOOD CAUSE EXIST for the extension as defense counsel has just been assigned
7 to this case, and requires time to be knowledgeable about the case to prepare an initial
8 pleading and, additionally, to explore possible early resolution through a settlement.

9 **IT IS SO STIPULATED.**

10 Dated: March 10, 2022

CENTER FOR DISABILITY ACCESS

12 By: _____/s/

13 AMANDA SEABOCK
14 Attorneys for Plaintiff ANDRES GOMEZ

15 Dated: March 10, 2022

NIVEN & SMITH, LLP

17 By: _____/s/

18 LEO LaROCCA
19 Attorneys for Defendant ELIZABETH ANN BRABY

20 **ORDER**

21 Pursuant to the parties' Stipulation, **IT IS SO ORDERED** that Defendant
22 ELIZABETH ANN BRABY shall answer or otherwise respond to Plaintiff's Complaint on or
23 before March 25, 2022. Additionally, **IT IS FURTHER ORDERED** that the last day for
24 parties and counsel to hold a joint site inspection under General Order No. 56, § 7 of the
25 premises is June 13, 2022.

26 Dated: 3/14/2022


27 **PHYLLIS J. HAMILTON**
28 JUDGE